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7 UNITED STATES DISTRICT COURT
8
9 DISTRICT OF NEVADA

10 CASEY COVENTRY,

11 Plaintiff,

12 v.

13 RANDI LUAN SADLER, individually; NEW
14 PRIME, INC. dba PRIME, INC., a foreign
15 corporation; DOE I through X,

CASE NO. 2:24-cv-01006-ART-DJA

**ORDER FOR EXTENSION OF
DISCOVERY DEADLINES
(SECOND REQUEST)**

16
17 Defendants.

18
19 COMES NOW Plaintiff CASEY COVENTRY by and through his attorney of record, CLARK
20 SEEGMILLER, ESQ. of the RICHARD HARRIS LAW FIRM, and Defendants RANDI LUAN
21 SADLER and NEW PRIME INC. dba PRIME, INC. by and through their counsel of record, KARIE
22 N. WILSON, ESQ., of MESSNER REEVES, LLP., and hereby stipulate that all operative dates
23 within the current Scheduling Order be extended by sixty (60) days.

24 **A. Statement of Completed Discovery**

25 The parties have served their disclosures pursuant to FRCP 26 and LR 26-1 and conducted
26 the following discovery:

1. Plaintiff served his Initial Disclosures on July 25, 2024.
2. Plaintiff served his First Supplement to Initial Disclosures on September 19, 2024.
3. Plaintiff served his Second Supplement to Initial Disclosures on September 24, 2024.
4. Defendants served their Initial Disclosures on July 8, 2024.
5. Defendants served their First Supplement to Initial Disclosures on October 2, 2024.
6. Defendants served their First Set of Interrogatories and Requests for Production of Documents to Plaintiff on July 9, 2024.
7. Plaintiff served his Responses to Defendants' First Set of Interrogatories and Requests for Production of Documents on August 6, 2024.
8. Plaintiff served his First Set of Interrogatories and Requests for Production of Documents to Defendant New Prime on August 15, 2024.
9. Defendant New Prime responded to Plaintiff's First Set of Interrogatories and Requests for Production of Documents on October 1, 2024.
10. Plaintiff served his First Set of Interrogatories and Requests for Production of Documents to Defendant Randi Luan Sadler on August 16, 2024.
11. Defendant Randi Luan Sadler responded to Plaintiff's First Set of Interrogatories and Requests for Production of Documents on October 1, 2024.
12. Defendants issued a Subpoena Duces Tecum to Briggs Transportation of Employment Records of Plaintiff.
13. The Zoom deposition of Plaintiff Casey Coventry was conducted on January 29, 2025.
14. Defendants served their Second Supplement to Initial Disclosures on April 9, 2025.

B. Statement of Discovery that Remains to be Completed

1. Obtaining complete copies of Plaintiff's medical treatment and billing records from his medical providers in Texas and Oklahoma;
2. Disclosure of initial and rebuttal expert witnesses;
3. Depositions of the parties' retained experts;

- 1 4. Depositions of Plaintiff's treating physicians;
- 2 5. Deposition of Randi Luan Sadler;
- 3 6. Deposition of the FRCP 30(b)(6) representative for Defendant New Prime, Inc.;
- 4 7. Additional written discovery, as needed; and
- 5 8. Any additional discovery deemed necessary by the parties.

6 **C. Statement Supporting Necessity of Extension of All Dates**

7 The parties have been diligent in conducting discovery. Defendants have been in the process
8 of requesting Plaintiff's medical treatment records from his out-of-state physicians and medical
9 facilities but do not yet have complete records. Specifically, Defendants are awaiting responses and
10 medical records from Walmart Pharmacy in Oklahoma, and Dr. John Gonino and The Center for
11 Special Surgery in Texas. Until Defendants have obtained these medical records, they are not in a
12 position to identify and disclose medical experts. To ensure that all parties have the opportunity to
13 retain appropriate expert witnesses, the parties have agreed to continue the current deadlines by an
14 additional sixty (60) days. This extension will allow the parties to retain experts and conduct
15 additional depositions.

16 **D. Proposed Schedule**

17 With a sixty (60) day discovery extension, the new **Discovery Cut-Off** date will be **Friday, 18
September 26, 2025**. All parties anticipate timely completion of discovery at that time. The schedule
19 for discovery will follow the pattern as set forth in LR 26-1:
20

21 **Amending the Pleadings and Adding Parties: Tuesday, June 24, 2025.**

22 Fed. R. Civ. Proc. 26(a)(2) **Disclosures (Experts):** The disclosure of experts and expert
23 reports shall occur on **Tuesday, July 29, 2025**, which is sixty (60) days before the proposed discovery
24 cut-off date. The disclosure of **Rebuttal Experts** and their reports shall occur on **Tuesday, August
25, 2025**, which is thirty (30) days before the proposed discovery cut-off date.

26 **Dispositive Motions:** Dispositive motions will be made no later than **Friday, October 24,
27 2025**, which does not exceed the outside limit of thirty (30) days following the discovery cut-off date

1 that LR 26-1(e)(4) presumptively sets for filing dispositive motions.
2

3 **Pretrial Order:** The Joint Pretrial Order shall be filed by **Wednesday, November 26, 2025**,
4 which is no later than thirty (30) days after the date set for the filing of dispositive motions. In the
5 event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until
6 thirty (30) days after decisions on the dispositive motions or by further order of the Court.

7 Extensions or Modifications of Discovery Plan and Scheduling Order: All motions or
8 stipulation to extend a deadline set forth in a discovery plan shall be received by the Court no later
9 than twenty-one (21) days before the expiration of the subject deadline.

10 IT IS SO STIPULATED.

11 Dated this 2nd of May 2025.

12 RICHARD HARRIS LAW FIRM

14 /s/ Clark Seegmiller, Esq.

15 CLARK SEEGMILLER, ESQ.
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19 Telephone: (702) 444-4444
Email: Clark@richardharrislaw.com
Attorneys for Plaintiff
Casey Coventry

Dated this 2nd of May 2025.

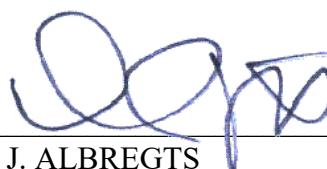
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Attorney for Defendants
Randi Luan Sadler and New Prime, Inc.

21 **ORDER**

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23 IT IS SO ORDERED on this 5th day of May, 2025.

24
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26
27
28 
DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

Nancy Amaya

From: Clark Seegmiller <clark@richardharrislaw.com>
Sent: Friday, May 2, 2025 8:15 AM
To: Karie Wilson; Amanda Frizzell
Cc: Gloria Pacheco; Caitlyn Robles-Gonzalez; Nancy Amaya
Subject: RE: Casey Coventry v. New Prime

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This looks good. You may affix my e-signature. Thanks

Clark Seegmiller

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Please read the [Legal Disclaimer](#) that governs this email and any attachments.

From: Karie Wilson <KWilson@messner.com>
Sent: Thursday, May 1, 2025 6:57 PM
To: Amanda Frizzell <afrizzell@richardharrislaw.com>; Clark Seegmiller <clark@richardharrislaw.com>
Cc: Gloria Pacheco <gloria@richardharrislaw.com>; Caitlyn Robles-Gonzalez <crobles@messner.com>; Nancy Amaya <NAmaya@messner.com>
Subject: RE: Casey Coventry v. New Prime

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Hi Amanda,

The proposed Stipulation and Order to Extend Discovery is attached. Please let me know if there are any proposed changes or additions, or if we may include Clark's signature for filing.

Thank you.

KARIE N. WILSON
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